

ESTTA Tracking number: **ESTTA412349**

Filing date: **06/02/2011**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91199728
Party	Plaintiff Minnesota Twins, LLC
Correspondence Address	Meichelle R. MacGregor Cowan, Liebowitz & Latman, P.C. 1133 Avenue of the Americas New York, NY 10036 UNITED STATES mrm@cll.com,trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
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Date	06/02/2011
Attachments	THETWINSMOTIONONCONSENT.pdf ( 3 pages )(11322 bytes )

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Application Serial No. 77/958,904  
Filed: March 15, 2010  
For Mark: THE TWINS and Design  
Published in the Official Gazette: November 9, 2010

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MINNESOTA TWINS, LLC,	:
	:
Opposer,	:
	:
v.	:
	:
TAMARA PINEGAR AND KIMBERLEY	:
PINEGAR,	:
Applicants.	:
-----X	

Commissioner for Trademarks  
Attn: Trademark Trial and Appeal Board  
P.O. Box 1451  
Alexandria, VA 22313-1451

Opposition No. 91199728

**MOTION ON CONSENT TO SUSPEND PROCEEDINGS  
AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

Opposer, by and through counsel, hereby moves for an order suspending the proceedings in this matter for a period of six months, *i.e.*, up to and including **December 2, 2011**. Applicant and Correspondent of Record, Tamara Pinegar, counsel consented to this motion, which is requested to allow the parties to engage in settlement discussions.

In the event that the Board denies this motion, Opposer consents to an extension of time for Applicants to file an answer or otherwise respond to the Notice of Opposition until sixty (60) days after such denial.

If the Board grants this motion, the Board should also reset Applicants' time to answer or otherwise respond to the Notice of Opposition. Additionally, the parties request that six months of discovery be allowed and that the discovery cutoff be reset to six (6) months after the

proceedings resume so that the parties will have the full period of discovery in the event that the matter is not able to be resolved. The trial periods and other periods should be reset accordingly.

Dated: New York, New York  
June 2, 2011

Respectfully submitted,

COWAN LIEBOWITZ & LATMAN, P.C.  
Attorneys for Opposer

By: /Meichelle R. MacGregor/

Mary L. Kevlin

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on June 2, 2011, I caused a true and correct copy of the foregoing Motion On Consent To Suspend Proceedings And To Extend Discovery Period If Opposition Is Resumed to be sent via First Class Mail, postage prepaid, to Applicant and Correspondent of Record at the following address: Tamara Pinegar, 1690 Sweet View Court, Henderson, Nevada 89014-7520.

/Meichelle R. MacGregor/  
Meichelle R. MacGregor